

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, DC 20554

In the matter of Annual Certification)	
of Federal Universal Service Funding)	WC Docket 09-197
for Eligible Telecommunications)	
Carriers in Virginia)	

VIRGINIA PCS ALLIANCE, L.C. AND RICHMOND 20 MHz, LLC (NTELOS)

**SUPPLEMENT TO ANNUAL CERTIFICATION REGARDING USE OF
FEDERAL UNIVERSAL SERVICE SUPPORT**

Pursuant to discussions with Wireline Competition Bureau Staff, Virginia PCS Alliance and Richmond 20MHz (d.b.a. "NTELOS") hereby submit the following supplement to the original annual certification regarding the use of Federal Universal Service support filing made August 19, 2009 under CC Docket 96-45.

I. Certification Statement Clarification

NTELOS wishes to further clarify the certification of five statements and provide those certifications below in addition to the responses provided in the original filing.

Certify that ETC's basic rates in rural areas of the Commonwealth of Virginia served by non-rural incumbent local exchange carriers are reasonably comparable to urban rates;

NTELOS certifies that its basic rates in rural areas of the Commonwealth of Virginia are reasonably comparable to urban rates.

Certify that the ETC is complying with applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Service;

NTELOS certifies that it is in compliance with applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Service.

Certify that the ETC is able to function in emergency situations;

NTELOS certifies that it is able to function in emergency situations.

Certify that the ETC is offering local usage plans comparable to those offered by the incumbent local exchange carrier (LEC) in the relevant service areas;

NTELOS certifies that it offers local usage plans comparable to those offered by the incumbent local exchange carrier (LEC) in the relevant service areas.

Certify that ETC acknowledges that the Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

NTELOS certifies that it acknowledges that it may be required to provide equal access if no other ETC in the designated service area is providing equal access.

II. 2008 Fund Use Clarification

NTELOS herein provides, as Exhibit A, the revised build plan which outlines the 2008 spend by wire center which was funded in part by the disbursement of funds received for 2008 high-cost universal service support that totaled \$1,052,305. This updates the previously submitted build plan for future years to include the 2008 information.

III. Coverage Map Clarification

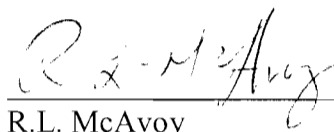
NTELOS herein provides, as Exhibit B, five maps which show an overlay of the NTELOS coverage area with the NTELOS ETC service area. The first map displays the entire state of Virginia and the subsequent maps illustrate the Hampton Roads area, Metro Richmond, western Virginia's northern region and western Virginia's southern region, respectively.

IV. Outage Clarification

NTELOS would like to submit, as Exhibit C, a revised outage report which lists the procedures implemented post-outage to prevent outages of that nature in the future.

NTELOS also mistakenly omitted the number of affected customers for the February 15, 2008 outage in the report that was originally filed. That number should have been submitted as 42,826 and is shown corrected on Exhibit C.

Respectfully submitted,

A handwritten signature in cursive script, reading "R.L. McAvoy". The signature is written in black ink and is positioned above a horizontal line.

R.L. McAvoy
Senior Vice President – Wireless Engineering and
Operations
NTELOS Inc.

EXHIBIT A

NTELOS REVISED FIVE-YEAR BUILD PLAN
INCLUDING 2008 FUND USE

VIRGINIA PCS ALLIANCE - 5-YEAR BUILDOUT PLAN IN VIRGINIA

CLLI	Wire Center	2008 Actuals	2009 Signal Quality	2009 Capacity	2009 Coverage	2010 Signal Quality	2010 Capacity	2010 Coverage	2011 Signal Quality	2011 Capacity	2011 Coverage	2012 Signal Quality	2012 Capacity	2012 Coverage	2013 Signal Quality	2013 Capacity	2013 Coverage
AMHRVAXA	AMHERST	\$133,193	\$0	\$65,390	\$143,440	\$0	\$62,640	\$130,265	\$0	\$60,115	\$130,200	\$0	\$57,785	\$130,140	\$0	\$55,630	\$130,090
APMTVAXA	APPOMATTOX	\$131,058	\$0	\$65,390	\$130,940	\$0	\$62,640	\$130,265	\$0	\$60,115	\$130,200	\$0	\$57,785	\$130,140	\$0	\$55,630	\$130,090
BCHNVABH	BUCHANAN	\$231,571	\$0	\$52,312	\$104,752	\$0	\$50,112	\$104,212	\$0	\$48,092	\$104,160	\$0	\$46,228	\$104,112	\$0	\$44,504	\$104,072
BDFRVABD	BEDFORD	\$421,629	\$0	\$104,624	\$216,104	\$0	\$100,224	\$215,024	\$0	\$96,184	\$214,920	\$0	\$92,456	\$214,824	\$0	\$89,008	\$214,744
BEVLVABV	BERRYVILLE	\$32,182	\$0	\$13,078	\$22,888	\$0	\$12,528	\$22,753	\$0	\$12,023	\$22,740	\$0	\$11,557	\$22,728	\$0	\$11,126	\$22,718
BRWRVAXA	BRIDGEWTR	\$91,992	\$0	\$13,078	\$52,556	\$0	\$25,056	\$189,706	\$0	\$36,069	\$78,120	\$0	\$34,671	\$78,084	\$0	\$33,378	\$78,054
BRWYVAXA	BROADWAY	\$270,324	\$0	\$39,234	\$192,464	\$0	\$37,584	\$78,159	\$0	\$36,069	\$78,120	\$0	\$34,671	\$78,084	\$0	\$33,378	\$78,054
CHHMVACH	CHATHAM	\$314,159	\$0	\$39,234	\$78,564	\$0	\$37,584	\$78,159	\$0	\$36,069	\$78,120	\$0	\$34,671	\$78,084	\$0	\$33,378	\$78,054
CRTDVAXA	CRITTENDEN	\$165,400	\$0	\$34,026	\$219,924	\$0	\$32,619	\$93,924	\$0	\$30,918	\$93,924	\$0	\$29,382	\$93,924	\$0	\$27,993	\$93,924
DBLNVADU	DUBLIN	\$138,932	\$0	\$26,156	\$52,376	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
DSPAVAXA	DISPUTANTA	\$52,648	\$0	\$11,342	\$91,980	\$0	\$10,873	\$28,980	\$0	\$10,306	\$28,980	\$0	\$9,794	\$28,980	\$0	\$9,331	\$28,980
DSWLVAXA	DOSWELL	\$104,478	\$0	\$11,342	\$91,980	\$0	\$10,873	\$28,980	\$0	\$10,306	\$28,980	\$0	\$9,794	\$28,980	\$0	\$9,331	\$28,980
EDOMVAXA	EDOM	\$84,765	\$0	\$13,078	\$107,788	\$0	\$12,528	\$22,753	\$0	\$12,023	\$22,740	\$0	\$11,557	\$22,728	\$0	\$11,126	\$22,718
EKTNVAXA	ELKTON	\$92,274	\$0	\$13,078	\$47,888	\$0	\$12,528	\$26,053	\$0	\$12,023	\$26,040	\$0	\$11,557	\$26,028	\$0	\$11,126	\$26,018
FKLNVAXB	FRANKLIN	\$52,648	\$0	\$11,342	\$94,308	\$0	\$10,873	\$168,908	\$0	\$20,612	\$60,288	\$0	\$19,588	\$60,288	\$0	\$18,662	\$60,288
GLCSVAXA	GLOUCESTER	\$225,293	\$0	\$22,684	\$57,960	\$0	\$21,746	\$57,960	\$0	\$20,612	\$470,760	\$0	\$48,970	\$144,900	\$0	\$46,655	\$144,900
GNWDVAGW	GREENWOOD	\$91,513	\$0	\$26,156	\$52,376	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
GRTSVAXA	GROTTOS	\$125,347	\$0	\$39,234	\$273,064	\$0	\$37,584	\$78,159	\$0	\$36,069	\$78,120	\$0	\$34,671	\$78,084	\$0	\$33,378	\$78,054
HAYSVAXA	HAYES	\$208,030	\$0	\$22,684	\$57,960	\$0	\$21,746	\$57,960	\$0	\$20,612	\$57,960	\$0	\$19,588	\$57,960	\$0	\$18,662	\$57,960
HRBGVAXA	HARRISONBG	\$937,877	\$0	\$130,780	\$679,884	\$0	\$137,808	\$286,583	\$0	\$132,253	\$286,440	\$0	\$127,127	\$286,308	\$0	\$122,386	\$286,198
IVORVAXA	IVOR	\$52,648	\$0	\$0	\$22,668	\$0	\$0	\$22,668	\$0	\$0	\$22,668	\$0	\$0	\$22,668	\$0	\$0	\$22,668
LDYSVAXA	LADYSMITH	\$314,252	\$0	\$45,368	\$367,920	\$0	\$43,492	\$115,920	\$0	\$41,224	\$115,920	\$0	\$39,176	\$115,920	\$0	\$37,324	\$115,920
LVTNVALN	LOVINGSTON	\$296,295	\$0	\$104,624	\$209,504	\$0	\$100,224	\$208,424	\$0	\$96,184	\$208,320	\$0	\$92,456	\$208,224	\$0	\$89,008	\$208,144
MDSNVAMA	MADISON	\$89,913	\$0	\$26,156	\$64,876	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
MGVLVAXA	MCGAHEYSVL	\$294,941	\$0	\$65,390	\$384,340	\$0	\$62,640	\$130,265	\$0	\$60,115	\$130,200	\$0	\$57,785	\$130,140	\$0	\$55,630	\$130,090
MNKNVAMN	MANAKIN	\$201,290	\$0	\$34,026	\$212,940	\$0	\$32,619	\$86,940	\$0	\$30,918	\$224,540	\$0	\$39,176	\$528,720	\$0	\$65,317	\$202,860
NRWSVANA	NARROWS	\$194,448	\$0	\$26,156	\$52,376	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
PWHTVAPW	POWHATAN	\$213,984	\$0	\$45,368	\$241,920	\$0	\$43,492	\$115,920	\$0	\$41,224	\$115,920	\$0	\$39,176	\$391,120	\$0	\$55,986	\$173,880
RPHNVAXA	RAPHINE	\$89,464	\$0	\$26,156	\$58,976	\$0	\$25,056	\$58,706	\$0	\$24,046	\$58,680	\$0	\$23,114	\$58,656	\$0	\$22,252	\$58,636
SMFDVAXA	SMITHFIELD	\$215,248	\$0	\$45,368	\$314,232	\$0	\$43,492	\$262,832	\$0	\$51,530	\$154,212	\$0	\$48,970	\$154,212	\$0	\$46,655	\$154,212
SNMTVASM	STONE MT	\$481,130	\$0	\$65,390	\$134,240	\$0	\$62,640	\$133,565	\$0	\$60,115	\$133,500	\$0	\$57,785	\$133,440	\$0	\$55,630	\$133,390
STCKVAXA	STONYCREEK	\$157,944	\$0	\$11,342	\$91,980	\$0	\$10,873	\$28,980	\$0	\$10,306	\$28,980	\$0	\$9,794	\$28,980	\$0	\$9,331	\$28,980
STCYVASC	STEPHENSCT	\$133,728	\$0	\$52,312	\$91,552	\$0	\$50,112	\$91,012	\$0	\$48,092	\$90,960	\$0	\$46,228	\$90,912	\$0	\$44,504	\$90,872
STDRVASD	STUARTS DRAFT	\$173,551	\$0	\$52,312	\$254,752	\$0	\$50,112	\$120,712	\$0	\$48,092	\$120,660	\$0	\$46,228	\$120,612	\$0	\$44,504	\$120,572
STTNVAVE	STAUNTON	\$178,894	\$0	\$52,312	\$111,352	\$0	\$50,112	\$110,812	\$0	\$48,092	\$110,760	\$0	\$46,228	\$110,712	\$0	\$44,504	\$110,672
TOANVATO	TOANO	\$165,708	\$0	\$34,026	\$282,924	\$0	\$32,619	\$369,124	\$0	\$51,530	\$151,884	\$0	\$48,970	\$151,884	\$0	\$46,655	\$151,884
WKFDVAXA	WAKEFIELD	\$52,648	\$0	\$11,342	\$94,308	\$0	\$10,873	\$31,308	\$0	\$10,306	\$31,308	\$0	\$9,794	\$31,308	\$0	\$9,331	\$31,308
WNSVAXA	WINDSOR	\$107,624	\$0	\$22,684	\$188,616	\$0	\$21,746	\$62,616	\$0	\$20,612	\$62,616	\$0	\$19,588	\$62,616	\$0	\$18,662	\$62,616
WNTRVAVG	LOVINGSTON	\$222,050	\$0	\$26,156	\$52,376	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
WVRLVAVV	WAVERLY	\$105,902	\$0	\$11,342	\$91,980	\$0	\$10,873	\$28,980	\$0	\$10,306	\$28,980	\$0	\$9,794	\$28,980	\$0	\$9,331	\$28,980
WYCVVAXA	WEYERSCAVE	\$36,382	\$0	\$13,078	\$26,188	\$0	\$12,528	\$163,653	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
DYTNVAXA	DAYTON	\$101,779	\$0	\$13,078	\$45,388	\$0	\$12,528	\$26,053	\$0	\$12,023	\$26,040	\$0	\$11,557	\$26,028	\$0	\$11,126	\$26,018
Column Totals		\$7,785,136	\$0	\$1,538,228	\$6,164,604	\$0	\$1,525,150	\$6,119,216	\$0	\$1,486,329	\$4,201,770	\$0	\$1,487,438	\$4,093,400	\$0	\$1,464,798	\$4,345,816

Yearly Totals

\$7,702,832

\$7,644,366

\$5,688,099

\$5,580,838

\$5,810,614

Notes

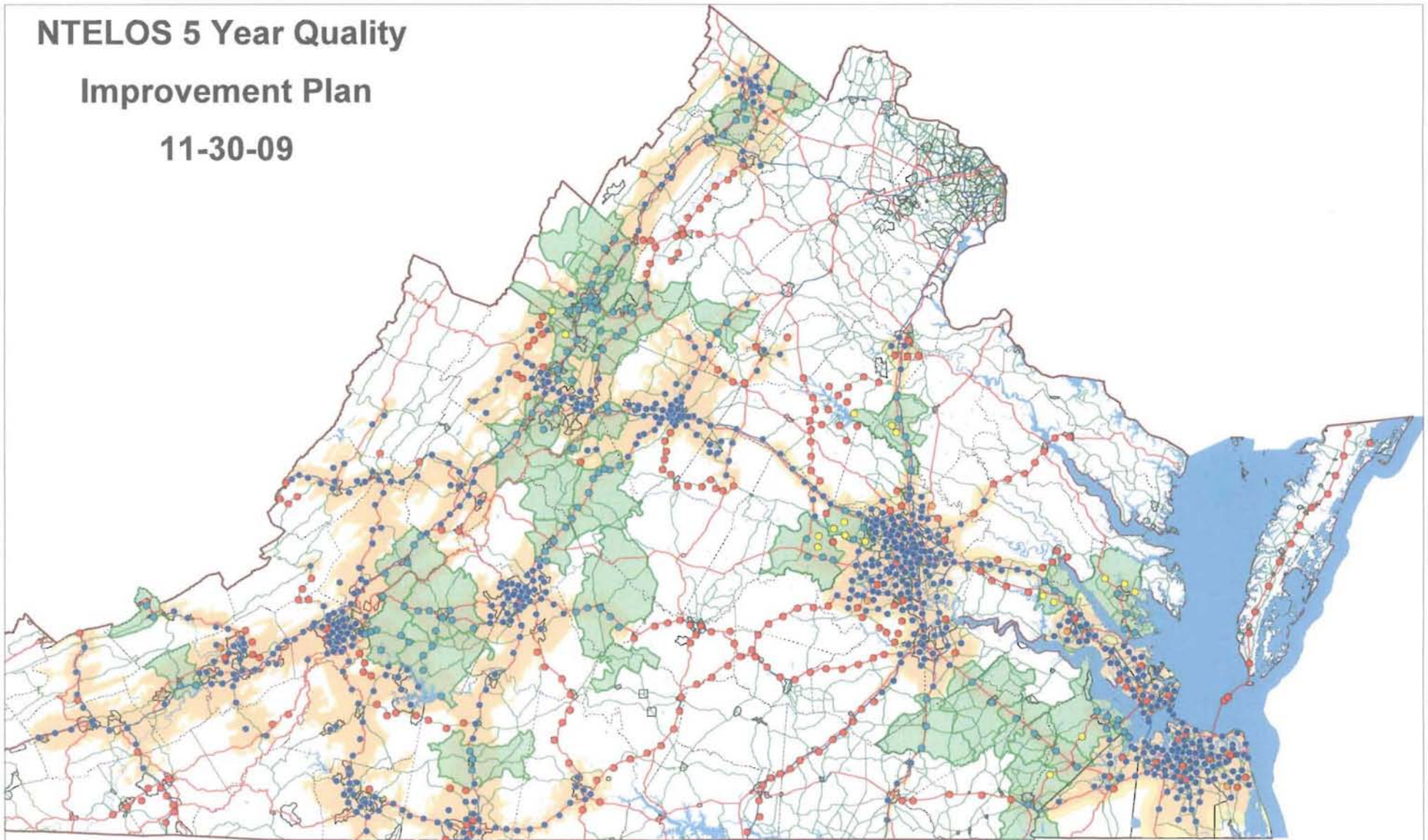
- 1 - The costs associated with 2009 new coverage sites is an estimate and the actual amount will be finalized when NTELOS completes its 2009 end of year budget review
- 2 - New sites beyond 2009 have not yet been approved
- 3 - Capacity dollars are estimates based on the need for additional channel cards and carriers. In reality dollars will probably shift between years and markets (for example, we may spend more in 2009 in the Amherst wire center than our estimate but less in Toana and vice-versa in 2010).
- 4 - All capacity dollars are estimates and will vary based on actual usage and subscriber growth.
- 5 - 2009 capacity dollars include costs associated with the EV-DO project.
- 6 - 2011-2013 totals are dependent on 2009 growth and can/will fluctuate based on projects completed in 2010 or pushed to future years.

EXHIBIT B

NTELOS COVERAGE/ETC MAPS (5)

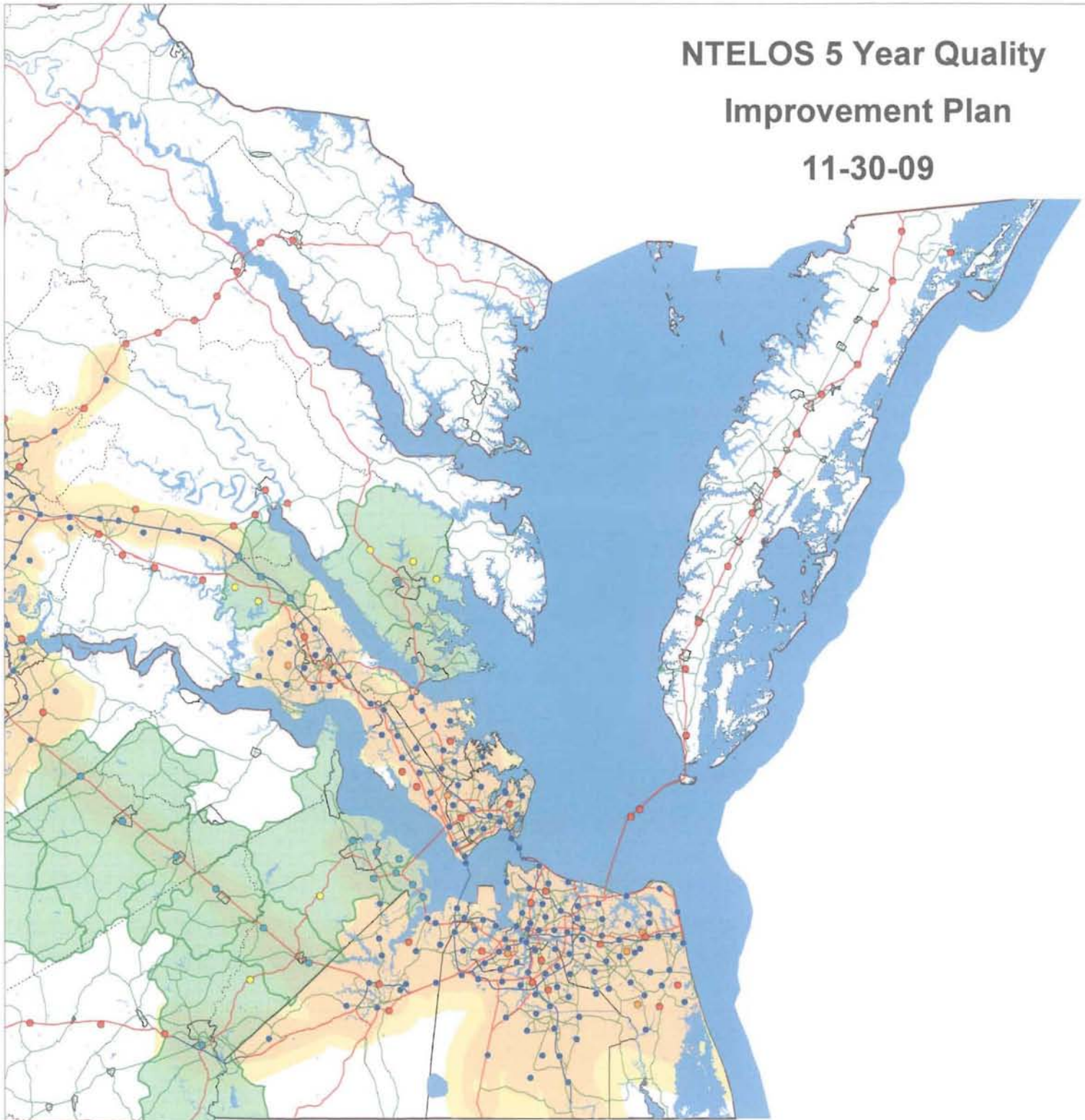
NTELOS 5 Year Quality Improvement Plan

11-30-09



- nTelos Site on Air - ETC Payout Area
- nTelos Site on Air - Non ETC Payout Area
- Planned nTelos Site - ETC Payout Area
- Planned nTelos Site - Non ETC Payout Area
- Proposed nTelos Site - ETC Payout Area
- Proposed nTelos Site - Non ETC Payout Area
- Current NTELOS ETC Payout Area
- nTelos Good Coverage Area
- nTelos Fringe Coverage Area

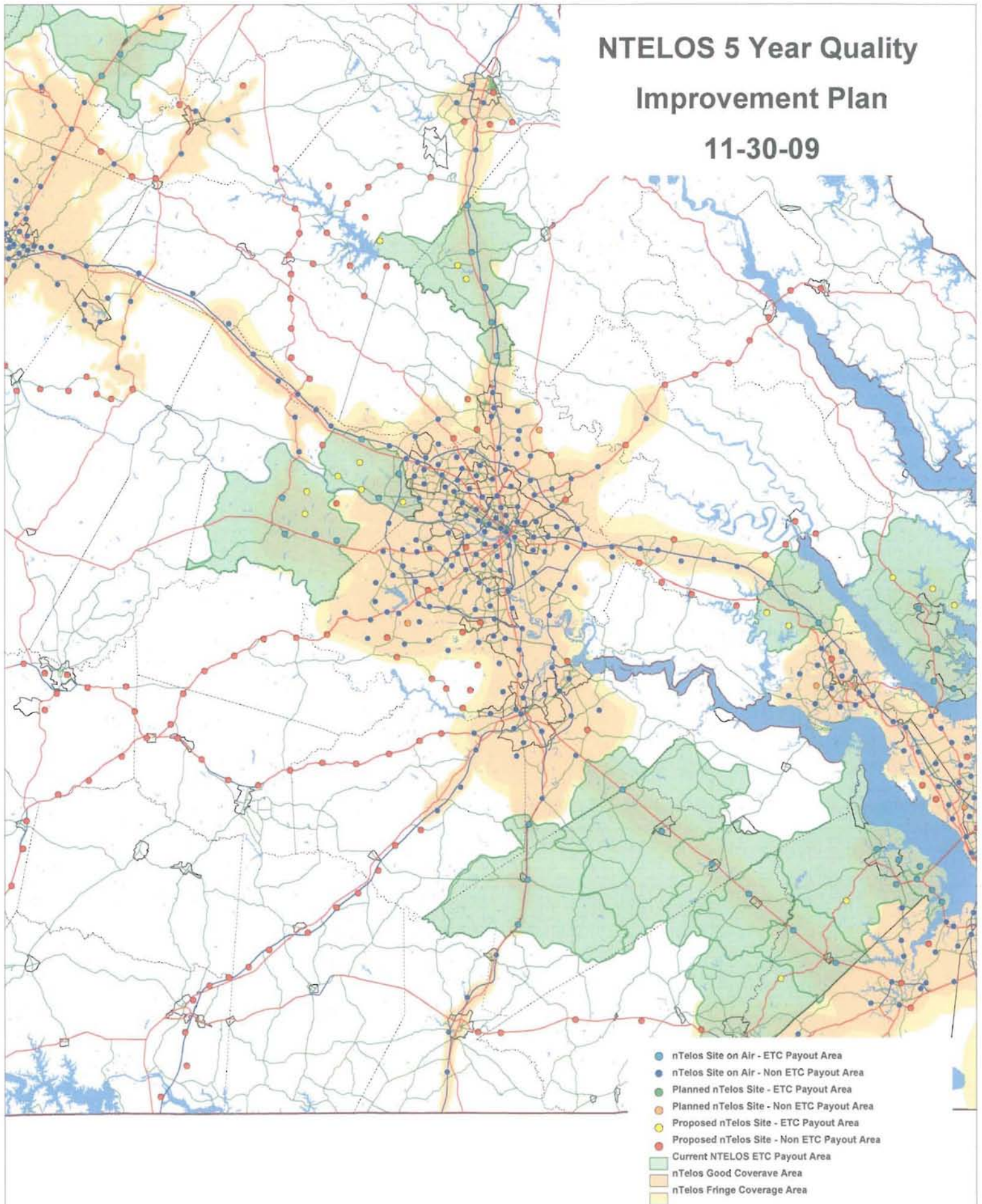
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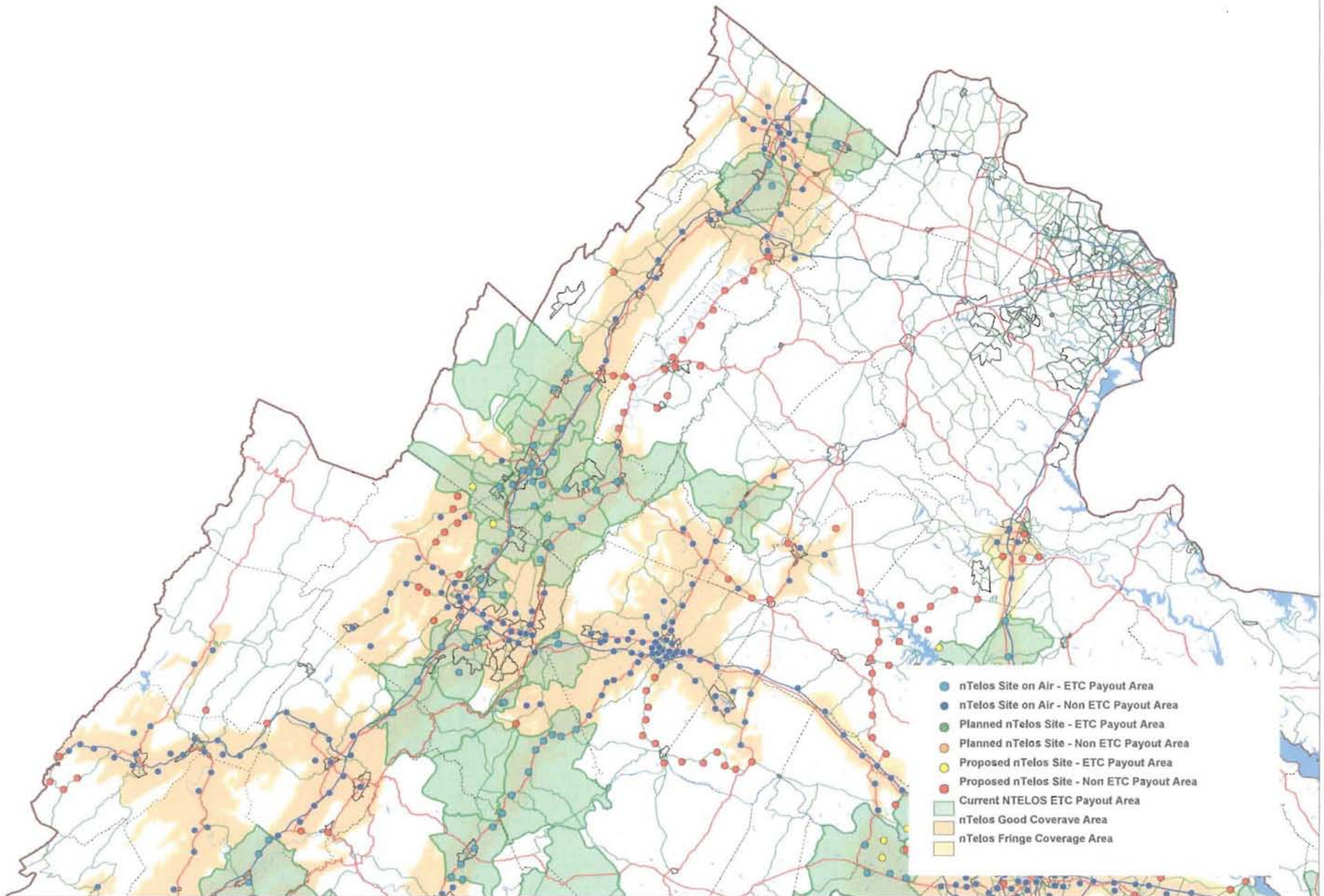
NTELOS 5 Year Quality Improvement Plan

11-30-09

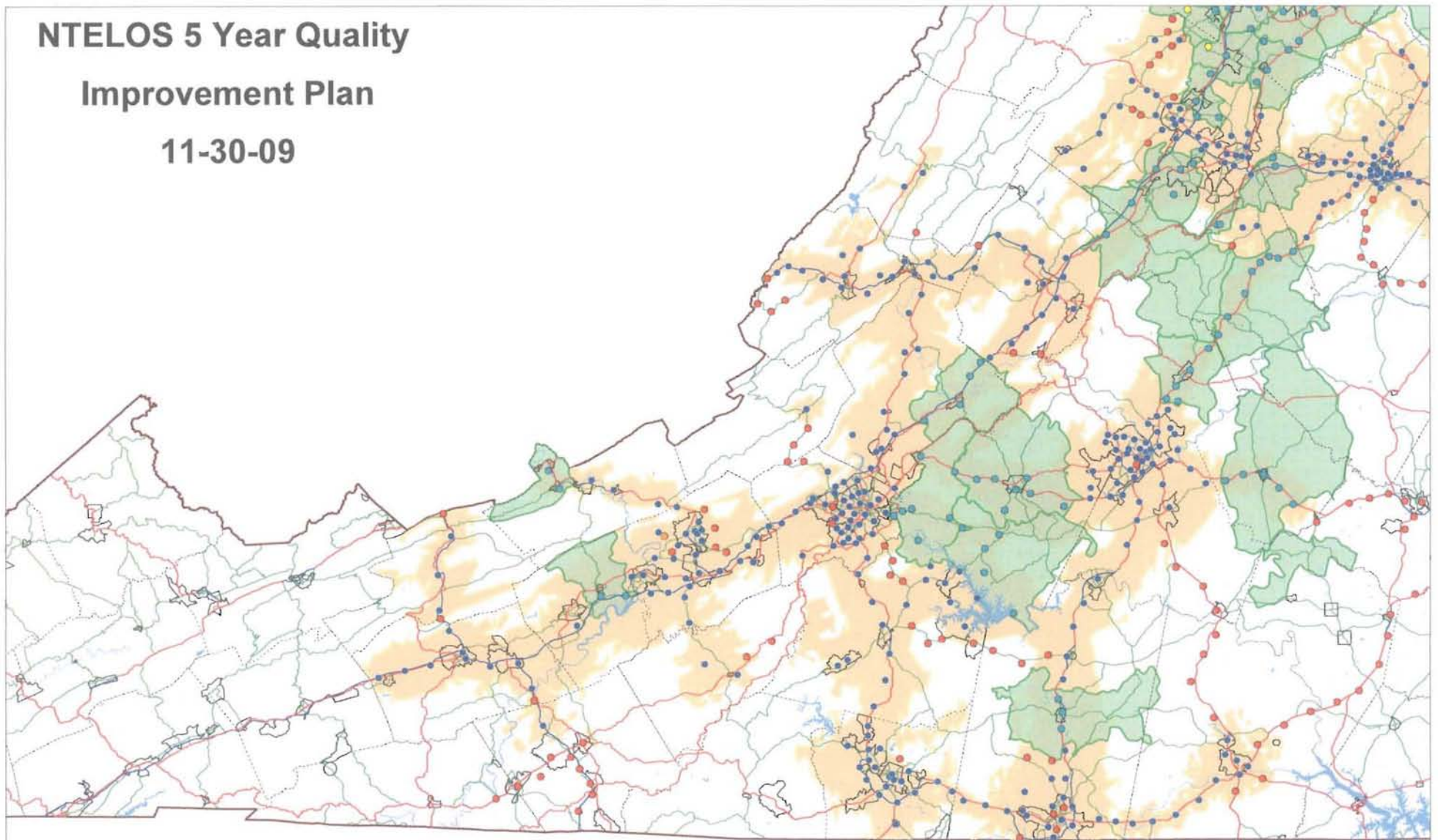


NTELOS 5 Year Quality Improvement Plan

11-30-09



NTELOS 5 Year Quality Improvement Plan 11-30-09



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EXHIBIT C

NTELOS MAJOR OUTAGE REPORT (REVISED)

Major Outages -- January 1, 2008 through December 31, 2008

Date	Time Start	Time End	Duration	Geographic area	Element	Event	Impact	Root Cause/Resolution	Reported Trouble Tickets Per Tech Support (Reflects all tickets recorded by NTELOS for event and is not limited to ETC region being evaluated)	Number of customers <u>potentially</u> affected
01/17/2008	7:00	9:00	2 hrs	Norfolk BTA	Lucent 5E	Hardware failures associated with SM1 triggered overload conditions. The first occurrence of the overload condition on Switch Module 1 (SM 1) was at 7am and the last occurrence was at 9am. There were a total of 12 occurrences each lasting between 30 – 45 seconds. There are approximately 25 – 30 sites homed off SM 1 that were impacted during the overload condition. Most of those sites are located on the Peninsula.	Customers reported experiencing two issues: 1) Customers can receive calls but outbound calls get "calling..." but does not connect. 2) Outbound calls get "network busy" error message.	Alcatel-Lucent (ALU) was doing a Core 700 upgrade on Switch Modules. A PSU COM became corrupted, and we started experiencing overloads due to the unstable state of the PSU COM. The immediate fix was to switch to the Standby PSU COM. Software for active PSU COM was reloaded during following maintenance window to address the corruption.	40	114,738
02/15/2008	3:00pm	7:00pm	4 hrs 0 mins	Lynchburg, Martinsville, Staunton-Waynesboro BTAs	CBSC	Call ceiling reached on the CBSC platforms caused call shedding.	Customers in Staunton, Waynesboro, Lynchburg and Martinsville areas reported getting delayed connection and call failed messages.	Capacity exceeded on Motorola CBSCs 965 and 963. During this period, Motorola base stations were being phased out and replaced by Alcatel-Lucent (ALU) base transceiver stations (BTSs) as part of a project to deploy EVDO. Motorola CBSC load was being reduced as Motorola base stations were replaced by ALU BTSs; however, CBSC threshold targets were exceeded prior to completing BTS transitions. Standard operating procedures regarding CBSC capacity augments were reviewed with employees to ensure guidelines are being followed to prevent similar service disruptions in the future.	34	42,826
02/02/2008	4:32pm *FTE	5:32pm *LTE	1 hr 0 mins	Richmond, Norfolk, Danville, Lynchburg, Martinsville, Roanoke, Staunton-Waynesboro, Charlottesville, Harrisonburg, and Winchester BTAs	STP	STP failure caused call processing failure.	Outbound and inbound calls getting either fast busy or the "all circuits busy" message. Both landline to mobile and mobile to landline were affected.	STP card failed to successfully reboot. The discrepant card was suspected of putting bad data on the buss causing a slight disruption of communication to the Waynesboro MTX. The discrepant card was replaced.	83	315,716
03/06/2008	1:16pm	4:40pm	3 hrs 24 mins	Danville, Lynchburg, Martinsville, Roanoke, Staunton-Waynesboro, Charlottesville, Harrisonburg, and Winchester BTAs	Prepay Trunks	25% of prepay trunks went out of service. Veisign restored.	Customers getting fast busy or "all circuits busy" message when calling out	25% of Prepay trunks dropped out of service. Pre-pay provider, Verisign, restored the trunks to service.	276	108864

Major Outages -- January 1, 2008 through December 31, 2008

Date	Time Start	Time End	Duration	Geographic area	Element	Event	Impact	Root Cause/Resolution	Reported Trouble Tickets Per Tech Support (Reflects all tickets recorded by NTELOS for event and is not limited to ETC region being evaluated)	Number of customers potentially affected
03/27/2008	4:44pm	6:20pm	1 hour 36 min	Danville, Lynchburg, Martinsville, Roanoke, Staunton-Waynesboro, Charlottesville, Harrisonburg, and Winchester BTAs	Acculink	Switch engineer went to the acculink to review which slots were available to add additional links for an SS7 augment to MM964, he pulled two unseated cards out for review. When he pulled these cards out, he accidentally bumped the cables that were connected to the active cards carrying live traffic for MM964 and dislodged them from their ports. This action caused two SS7 links to go down initially and then the remaining links dropped because they couldn't hold the entire call load during busy hour. Cables were reconnected, but the system did not resynch quickly due to the high traffic volume.	3/27/08 (16:44 - 17:50) Call processing load degraded by 30%; (17:50-18:20) All call processing on MM964 down - all NTLs, Sprint and any roamers in the Roanoke market and part of the WYBO market (three core sites - WBO Arby's, MTSO and W.WBYO) experienced total call processing outage.	Performing activities on or around critical equipment (Acculink) outside of maintenance window was the root cause of the outage. Switch access is/was limited to personnel that have a need to work on switch equipment. However, even personnel approved to work on switch equipment are not supposed to complete non-restoral activities outside of the NTELOS maintenance window. Standard operating procedures regarding approved maintenance windows and high risk notifications were reviewed with employees to ensure guidelines are being followed to prevent similar service disruptions in the future.	277	130,442
04/26/2008	1:00am	8:00am	7 hrs 0 mins	Danville, Lynchburg, Martinsville, Roanoke, Staunton-Waynesboro, Charlottesville, Harrisonburg, and Winchester BTAs	Tellabs 5500 DACS	DACS failure	Customers unable to make or receive calls.	Tellabs 5500 DACS had three discrepancies: 1) Defective OC-48 card, 2) Defective IMM card, and 3) Outdated software load. DACS Vendor, Tellabs, was brought in to troubleshoot the DACS and identify discrepant components. The Tellabs 5500 was supposed to be a dual fault tolerant device. Subsequent troubleshooting by Tellabs revealed that the DACS was not dual fault tolerant as advertised. The OC-48 card failure did not generate alarms, so it was not known to be defective until after troubleshooting by Tellabs. When the IMM failed and a dual fault condition existed, the DACS failed. We worked extensively with the vendor, Tellabs, to understand DACS limitations and to eliminate any outstanding	270	130,442